

WILMERHALE

June 6, 2025

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The Honorable James Donato
United States District Judge for the Northern District of California
450 Golden Gate Avenue, Courtroom 11, 19th Floor
San Francisco, CA 94102

Re: *Klein v. Meta Platforms, Inc.*, Case No. 3:20-cv-08570-JD

Dear Judge Donato:

Meta writes to address two incorrect statements Dr. Williams made at the June 5, 2025 concurrent proceeding that were not reasonably capable of being corrected by Dr. Tucker on the fly.

First, Dr. Williams asserted that Meta made “absolutely clear” in a “submission to the FTC” that “every single ad on Meta uses their social graph.” Meta said nothing of the sort. The portions of that submission cited in Dr. Williams’s reports do not even discuss using the social graph for advertising. The Court’s review of the cited portions, indicated in red boxes in the attached Exhibit 1, will confirm that Dr. Williams’s representation was inaccurate.

Second, Dr. Williams claimed that the “middle bullet” on slide 3 of Dr. Tucker’s presentation was “misleading” because it “didn’t actually quote my whole answer.” That is not true. Dr. Tucker’s slide quoted Dr. Williams’s entire answer to the question, as shown at 66:5-9 of the transcript and attached as Exhibit 2.

If it would be useful to the Court following yesterday’s concurrent expert proceeding, Meta respectfully requests that the Court set a hearing on Advertisers’ class certification motion and Meta’s motion to exclude Dr. Williams’s opinions. Should the Court wish to schedule such a hearing, Meta is available at the Court’s convenience.

Respectfully submitted,

By: /s/ Sonal N. Mehta

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